

Remarks

Regarding independent claims 1 and 17, it is believed that the rejection under 35 U.S.C. § 102(b) over Heider et al. is improper because Heider et al. does not teach the claimed "brake" operatively connected to the electric motor "for automatically braking the motor when the electric motor is turned off." The Examiner refers to Figures 16 and 17 of Heider et al. for teaching the brake. However, no brake is shown. Rather, planetary gear assemblies 118, 130 are shown without any braking structure whatsoever. The Examiner is reminded that prior art is anticipatory only if every element of the claimed invention is disclosed in a single item of prior art in the form literally defined in the claim. *Jamesbury Corp. v. Litton Indus. Products*, 756 F.2d 1556 (Fed. Cir. 1985). Accordingly, the rejection is improper because the claimed brake is not shown.

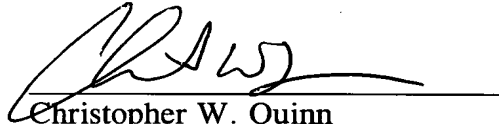
Regarding the rejection of independent claim 9, the Examiner has combined Compton with Heider et al. Again, as recited above, Heider et al. does not teach the use of a brake for an electric motor. Additionally, the Examiner states that Compton discloses the invention substantially as claimed, except the brake. However, Compton does not teach the claimed transmission housing "having an output shaft for directly driving the tarp spool." Rather, Compton teaches a chain drive, such as the chain 112 shown in Figure 9 and described at col. 5, ll. 55-58. This type of chain driven motor is very inefficient and impractical because the chains tend to rust and cease up, and the chain requires a significant amount of space, as well as mounting brackets and other supporting structure which is not required with the present invention. Rather, in the present invention, the claimed direct drive system is compact, and protected from the environment in a manner in which space is saved and part count is reduced, while improving efficiency and providing an automatic self-braking feature not taught in the cited references. Accordingly, the combination of Compton and Heider et al. would fall short of the recited subject matter of independent claim 9 of the present application.

Accordingly, in light of the above comments, it is believed that each of independent claims 1, 9 and 17, as well as their respective dependent claims, are allowable over the cited references. An indication to this effect is respectfully requested.

Respectfully submitted,

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BROOKS & KUSHMAN P.C.

A handwritten signature in black ink, appearing to read 'CW Quinn', is written over a horizontal line.

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